

Wyoming Department of Agriculture

Dave Freudenthal, Governor John Etchepare, Director

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April 8, 2005

Medicine Bow – Routt National Forests Attn: Clint Kyhl, District Ranger 2468 Jackson Street Laramie, WY 82070

To Mr. Kyhl,

Following are the comments from the Wyoming Department of Agriculture (WDA) on the scoping document to complete an analysis of unclassified routes on the Laramie Ranger District of the Medicine Bow National Forest (MBNF).

Our comments are specific to our mission within state government, which is to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this ongoing project will have major impacts upon our agriculture industry, our natural resources, and the welfare of our citizens, we believe it's important that we be kept informed of all actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

Fire and fuels, invasive species, loss of open space, and unmanaged recreation are the four threats identified by Forest Service Chief Dale Bosworth as having the greatest impact on the health of our Nation's forests and grasslands. The fourth threat, unmanaged recreation, includes off-highway vehicles (OHV) and all-terrain vehicles (ATV). This OHV/ATV misuse has a serious impact on the land and natural resources in Wyoming, among them: (1) severe soil erosion, (2) degradation of plant and woody species, (3) spread of invasive species, and (4) harassment of wildlife and livestock. For these reasons, the WDA supports the completion of a site-specific travel management analysis of the MBNF route inventory.

The WDA supports the U.S. Forest Service's proposed rule on travel management to require the establishment of a system of roads, trails, and areas designated for motor vehicle use. We agree that in recent years, the scenario of an occasional cross-country vehicle track has evolved into frequent situations of areas rutted by motor vehicle use. In the forest ecosystems in the Rocky Mountain west, these tracks eventually turn into trails and take a substantially longer period of time to return to their native state. As stated in the proposed rule, soil depth, water quality, and wildlife habitat are being adversely

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vehicle track has evolved into frequent situations of areas rutted by motor vehicle use. In the forest ecosystems in the Rocky Mountain west, these tracks eventually turn into trails and take a substantially longer period of time to return to their native state. As stated in the proposed rule, soil depth, water quality, and wildlife habitat are being adversely impacted. This scoping document states that damaging impacts can occur to trail stability, stream crossings, riparian zones and wet meadows, erosion and rutting. The WDA proposes that domestic livestock habitat, due to this soil, water and natural resource damage, is being negatively impacted under the current transportation management. We support the closure of all unclassified roads, trails and routes to motorized use, as well as the specification of which routes may be used by ATVs and OHVs.

The proposed action of this scoping would close all unclassified routes that lie within Inventoried Roadless Area (IRA) boundaries. Roadless areas should be identified locally at the forest level, and managed as areas of special resource. Top-down, broad-scale, one-size-fits-all amendments do not always work for natural resource conservation. This is why each individual national forest is managed separately from other forests in the region. We believe the travel management within the IRAs should also be managed locally at the forest level.

Management of the resource, especially ATV/OHV impacts, is only half of the effort needed to identify and secure a final travel management plan for the forest. Education and enforcement are needed to ensure that following a successful resource inventory, resource users are provided with the opportunity and incentive to recognize the designated use of routes and excluded areas. This effort will be of no avail if proper signage, education and **enforcement** are not provided to coincide with the management of each designated route or area (WDA emphasis added). What is the MBNF proposing to do for enforcement of the travel management plan?

The WDA recommends the USFS support the State of Wyoming in the creation of a reporting document for land-use abuse and access issues. This document can be used statewide to report violations of forest travel management plans. This effort will aid the MBNF by implementing measures of self-policing and reporting criteria to address abuse of the travel plan in an expeditious manner.

The WDA requests that livestock grazing permittees will retain administrative ATV/OHV use as it relates to the management of livestock on an allotment. Many permittees utilize ATVs and OHVs to ensure proper rangeland management. This ATV/OHV impact is extremely minimal in nature, and the administrative use should be included in any travel management plan.

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Please continue to include the WDA as an interested party in this analysis. Please forward all future information to:

Wyoming Department of Agriculture Natural Resource Section 2219 Carey Ave. Cheyenne, WY 82002

wdapolicy@state.wy.us

c/o Don Christianson, Matt Hoobler Senior Policy Analysts

We appreciate the opportunity to comment.

Sincerely,

John Etchepare

Director

JE/mh

Cc: Governor's Planning Office

Wyoming Game and Fish Department

Wyoming State Forestry

Wyoming State Trails Program